

EXHIBIT D

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

Alabama Gas Corporation,)	
Plaintiff,)	
v.)	CIVIL ACTION NO.:
)	2:10-cv-1840-IPJ
Travelers Casualty and Surety)	
Company, <i>et al.</i> ,)	
Defendants.)	
_____)	

Supplement to Expert Report of Dennis Unites

I hereby supplement my Expert Report in the above-styled matter to clarify that we accessed aerial photographs for years 1942 and 1978 from the on-line University of Alabama library. Those photographs may be viewed at <http://alabamamaps.ua.edu/aerials/Counties/Madison/index.html>. In addition, I relied upon analysis provided to me by Dr. Glen C. Gustafson of Environmental Image Group, who analyzed photographs for 1942, 1950, 1954, 1958, 1962, 1968 and 1971 using a zoom stereoscope. In general, stereoscopic examination of photographs provides much greater detail than can be seen with a single photograph, especially with the naked eye. Dr. Gustafson's September 11, 2011, report analyzing the photos for 1958, 1962, 1968 and 1971 is attached. Further, two days after the September 13, 2011 publication of my expert report, Dr. Gustafson has provided me with written analysis of photos he examined for 1942, 1950 and 1954, which is also attached. Dr. Gustafson's analysis of the photographs from 1950 and 1954 indicates that the dismantling or demolition of the holders and their associated below-grade structures appears to have been started prior to February 1950 but was not completed until sometime after February 1954. The 1950 photo showed shadows of the distribution holder superstructure. Further, Dr. Gustafson's examination shows that liquid contents

from one of the holder bottoms was being drained or otherwise diverted to the nearby creek in early 1954. Along with review of Dr. Gustafson's reports, I also had several conversations with him regarding his observations of the various photographs listed above.

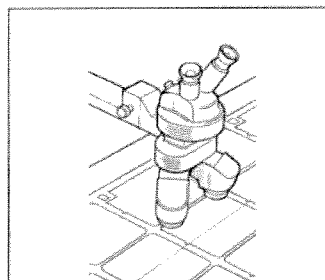
A handwritten signature in cursive script, appearing to read "Dennis F. Unites", is positioned above a horizontal line.

Dennis F. Unites

FAX

*Environmental Image
Group*

Glen C. Gustafson, PhD.
42 Banning Drive, PO Box 422
Avalon, CA 90704
Tel: (310) 612 - 3505
Blue-2002@GMX.NET



LETTER OF TRANSMITTAL

TO: Dennis Unites
GEI Consultants

DATE: September 11, 2011 4:30 PM Pacific Time

SUBJECT: Aerial Image Analysis Reports for 1936 (map), 1958, 1962,
1968, & 1971

Dennis:

The aerial imagery analysis report requested by Scott Laseter, of KGL Attorneys, follows. This covers the US Geological Survey, 1936 "Huntsville, AL" Topographic Quadrangle map(7.5 min.); May 30, 1958, US Department of Agriculture airphotos; March 1962 Aeroquest airphotos; March 27, 1968 Aeroquest airphotos; and February 6, 1971 Aeroquest airphotos. The aerial films from 1937, 1942, 1950, and 1954 are still to arrive. The 1942 film from the National Archives has been promised for either tomorrow (Monday), or the next day.

The "Uniform Image Analysis Report" which follows, has been compiled from stereo aerial films viewed over a light table through a standard Zoom Stereoscope. In its standard form, this equipment permits

viewing of aerial films with stereo vision and zoom capabilities up to 30X. The positions of objects on the sketchmaps are only visual approximations, regarding size and location.

In a few cases, the dimensions of ground objects are given. These are not estimations, but rather, approximate calculations based on standard "photo mensuration" techniques. If needed, the science of "photogrammetry" could be used to more correctly dimension ground objects, although this is more time-consuming.

Until further aerial film arrives, I have completed the task to the best of my ability in the time provided. I hope you will find this useful. Please feel free to contact me as needed with questions or clarifications.

Uniform Image Analysis Report

9/11/11

Environmental Image
Group

Glen C. Gustafson, PhD
P.O. Box 422
42 Banning Drive
Avalon, CA 90704
Tel: (310) 510-1541
Cell: (310) 612-3505
Blue-2002@GCMX.NET

Site Name: HUNTSVILLE MGP, AL

Date of Photography: 1936 USGS TOPO
MAP

Photo Source: US Geol. Survey

Nominal Scale: 1:24,000 Film Type: ✓

Reference No.: "HUNTSVILLE" TOPO QUAD

Comments: HIGHLY GENERALIZED US GEOL.

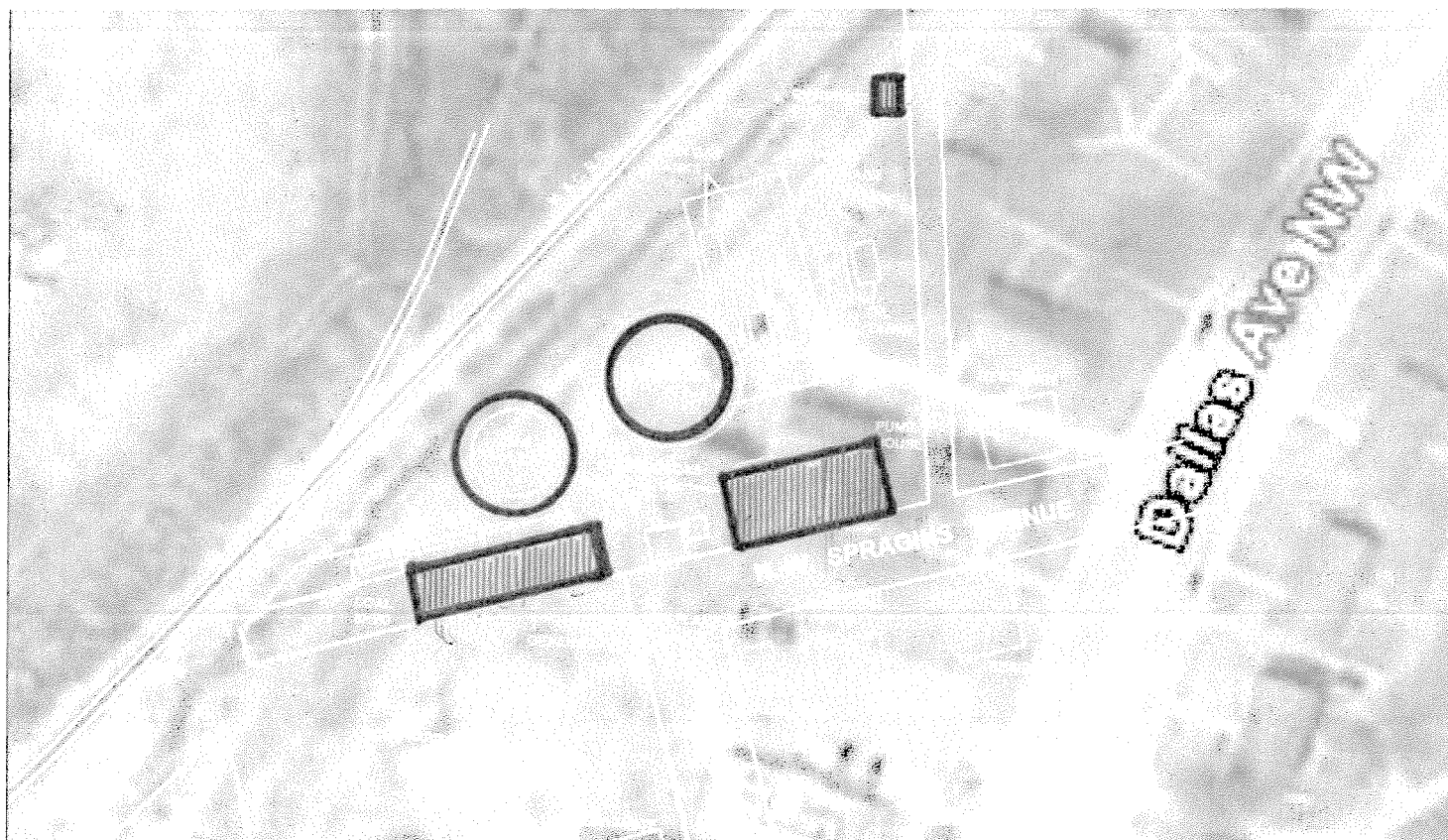
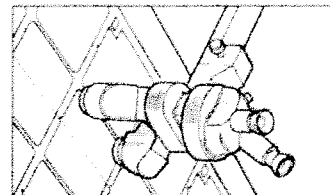
SURVEY MAP FROM 1936 SHOWS:

- 2 GAS HOLDERS

- RETORT BLDG.

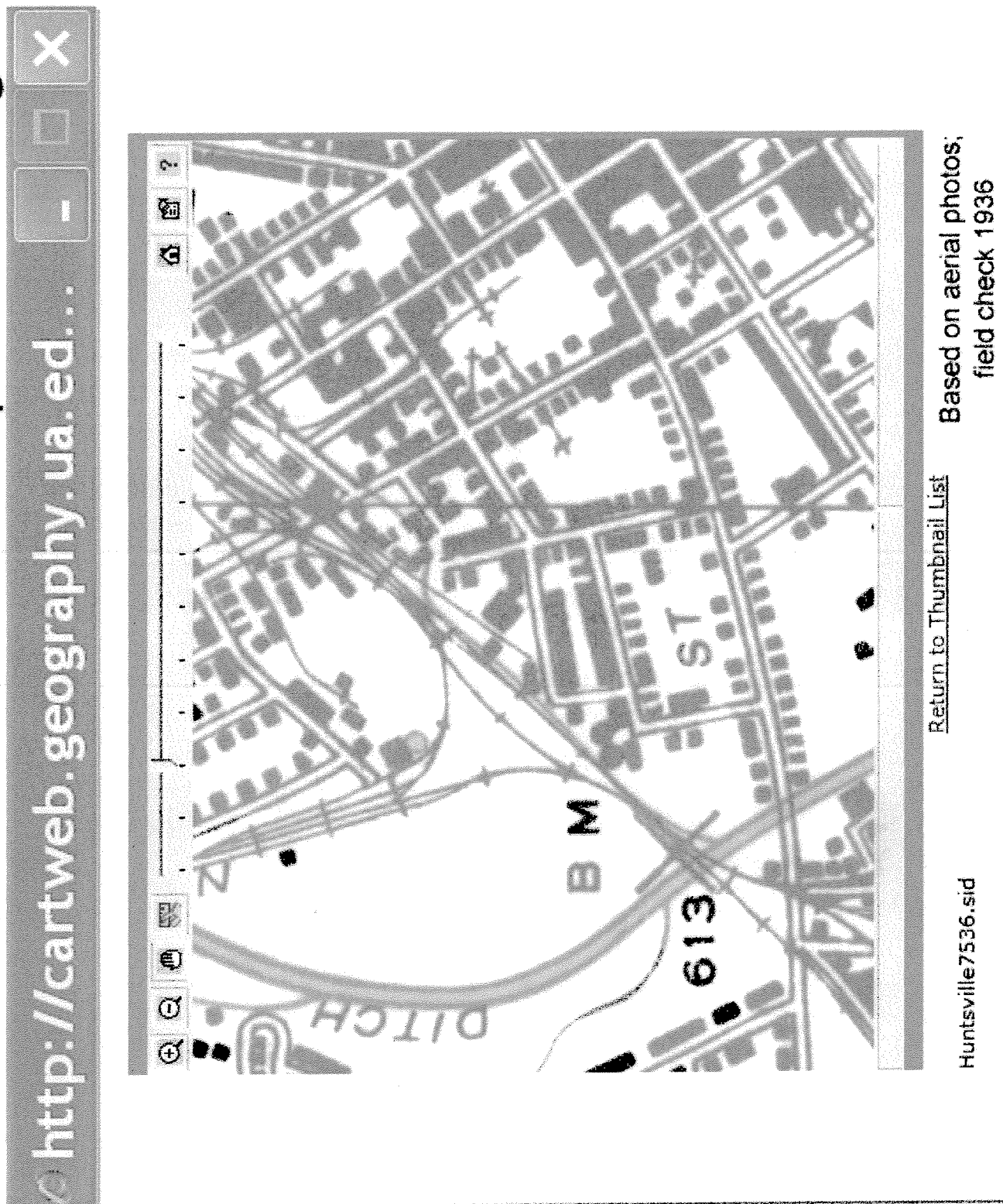
- PURIFIER HOUSE

- RESIDENCE (?) IN NORTH CORNER.



NOTE: Objects marked in heavy BLACK over the ghost image, present for this year.

Huntsville, AL 1936 USGS Topo Quadangle



Uniform Image Analysis Report

9/10/11

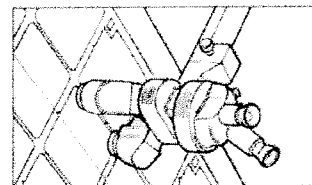
Environmental Image

Group

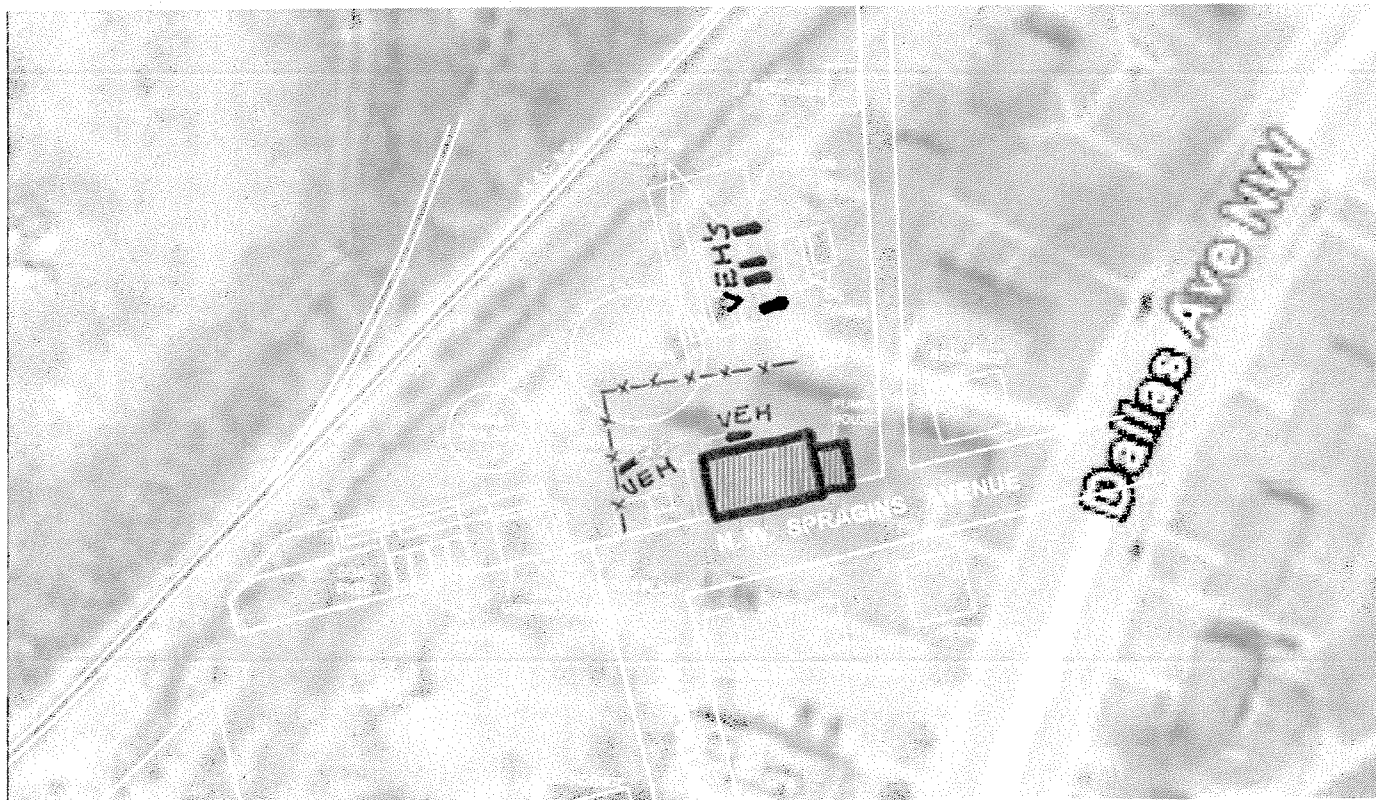
Glen C. Gustafson, PhD.
P.O. Box 422
42 Banning Drive
Avalon, CA 90704
Tel: (310) 510-1541
Cell: (310) 612-3505
Bue-2002@GCMX.NET

Site Name: HUNTSVILLE MGP, ALDate of Photography: MAY 30, 1958Photo Source: USDANominal Scale: _____ Film Type: PAN

Reference No.: _____



Comments: SITE CONTAINS: FORMER PURIFYING
HOUSE AND PUMP HOUSE (ATTACHED AT
E. END); 4 PROB. SMALL VEHICLES IN
GRASSY ^{YARD} AREA NORTH OF PURIFYING BLDG,
1 POSS. VEHICLE ALONGSIDE BLDG. NO
EVIDENCE OF FORMER GAS HOLDERS. (CONT.)



NOTE: Objects marked in heavy BLACK over the ghost image, present for this year.

IMAGE QUALITY: FAIR/POOR
(DARK)

HUNTSVILLE MGP, AL

MAY 30, 1958 COMMENTS, cont.

VERY

INACTIVE SITE APPEARANCE.

1

NO RESIDENCE IN EXTREME N
CORNER OF SITE.

Uniform Image Analysis Report

Site Name: HUNTSVILLE MGP, AL

Date of Photography: MARCH 1962

Photo Source: AEROQUEST

Nominal Scale: _____ Film Type: PAN

Reference No.: _____

Comments: SITE CONTAINS: PURIFYING HOUSE

ATTACHED PUMP HOUSE; ADJOINING PAVE-
MENT SHOWS 4 PROB. SMALL VEHICLES.

RESIDENCE IN N CORNER HAS 2 SKL. VEH'S

ADJOINING; GRASSY YARD AREA CONTAINS

2 PROB. SEMI-TRUCK TRAILERS, 3 UNKNOWN
(CONT.)

9/10/11

Environmental Image

Group

Glen C. Gustafson, PhD.
P.O. Box 422
42 Banning Drive
Avalon, CA 90704
Tel: (310) 510-1541
Cell: (310) 612-3505
Blue-2002@GMAX.NET

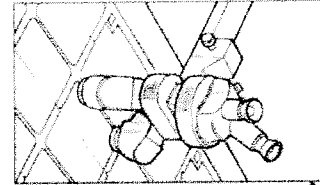
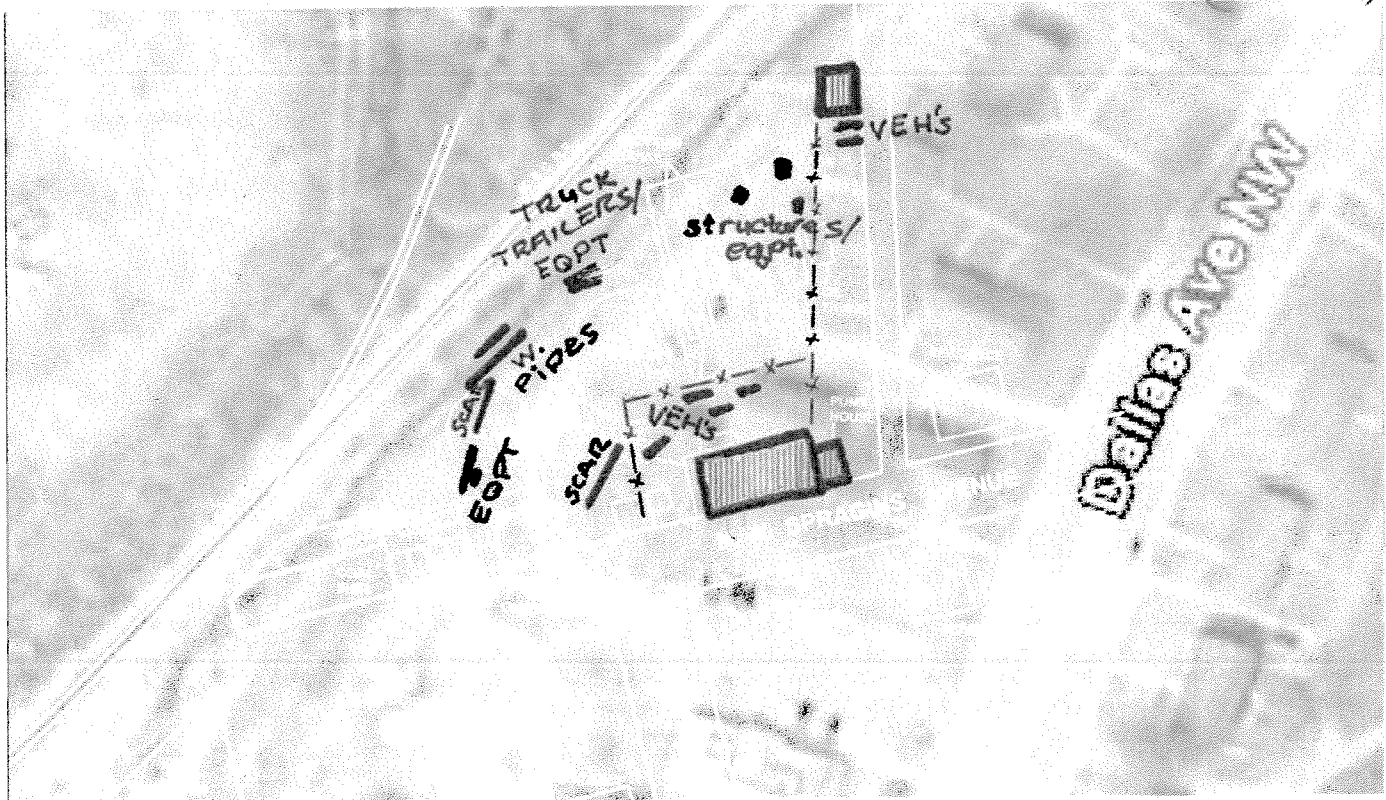


IMAGE QUALITY: GOOD



NOTE: Objects marked in heavy BLACK over the ghost image, present for this year.

HUNTSVILLE MGP, AL
MARCH 1962 COMMENTS cont.

- SMALL VEHICLES/EQUIPMENT,
- 1 APRX. 50-FOOT LONG WHITE PIPE OF LARGE DIAMETER, ~~2~~ 2 OTHER SHORTER WHITE PIPES; NEARBY ARE TWO LONG, NARROW AREAS OF WHITE GROUND SCARRING. SITE APPEARS ACTIVE,
 - VEHICLE TRAFFIC PATTERNS INDICATE THAT THE FORMER "COAL YARD" TO THE SOUTHWEST IS NOW A FUNCTIONAL PART OF THE SITE, WITH NO BREAK BETWEEN THE TWO.
 - NOTE: FORMER PUMP HOUSE IMMEDIATELY ADJOINS PURIFIER BUILDING ON THE EAST END; 1966 AND OTHER SANBORN MAPS SHOW A GAP BETWEEN THE TWO.

Uniform Image Analysis Report

Site Name: HUNTSVILLE MGP, AL

Date of Photography: MARCH 27, 1968

Photo Source: AEROQUEST

Nominal Scale: _____ Film Type: PAN

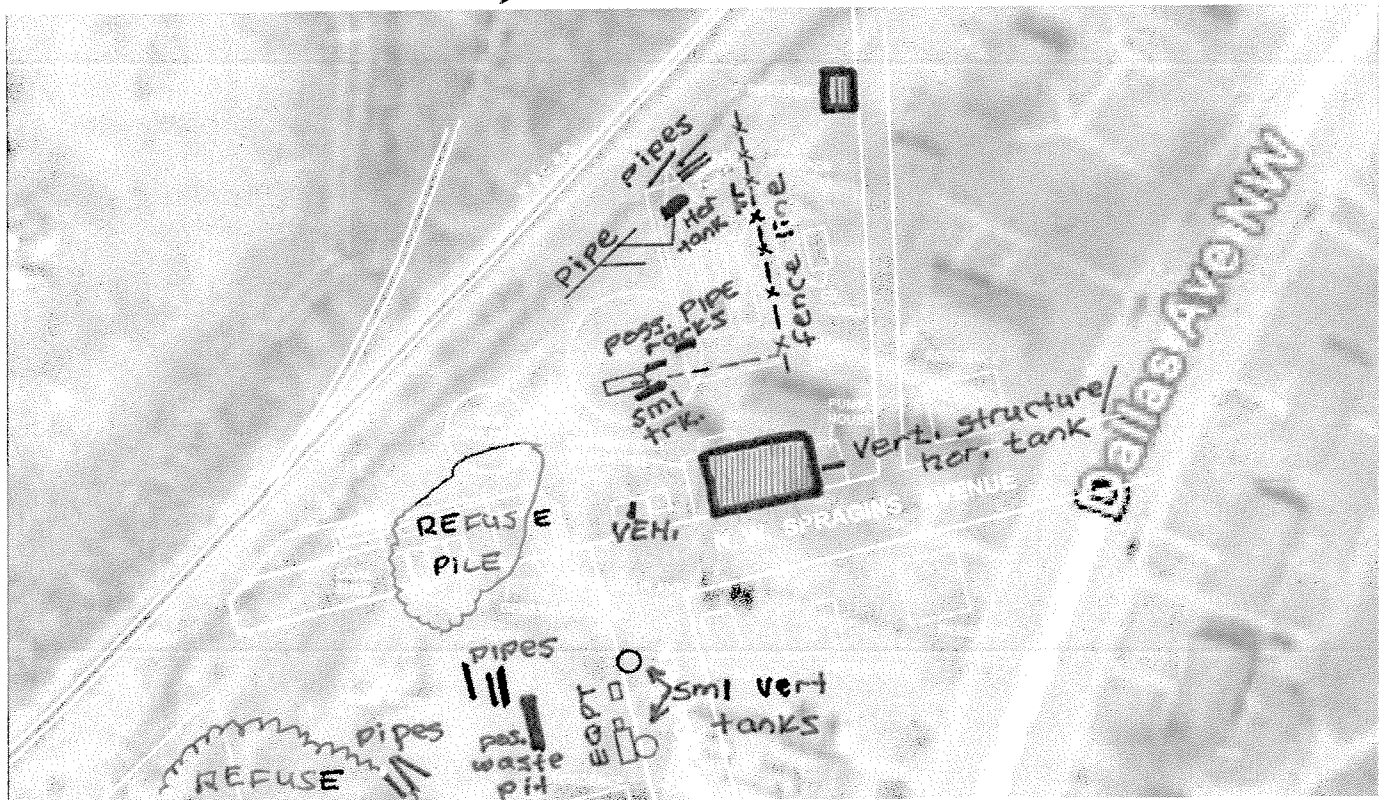
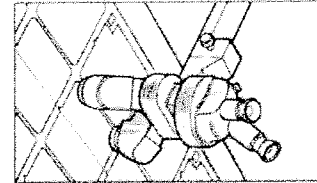
Reference No.: _____

Comments: REMAINING ORIGINAL BUILDINGS
INCLUDE ONLY THE FORMER PURIFYING
HOUSE AND THE RESIDENCE IN THE
NORTH CORNER OF THE PROPERTY.
THE PUMP HOUSE HAS BEEN REPLACED
BY A TALL, NARROW VERTICAL (cont.)

Glen C. Gustafson, Ph.D.
 P.O. Box 422
 42 Banning Drive
 Avalon, CA 90704
 Tel: (310) 510-1541
 Cell: (310) 612-3505
 Blue-2002@GCMX.NET

Environmental Image
 Group

9/10/11



NOTE: Objects marked in heavy BLACK over the ghost image, present for this year.

IMAGE QUALITY: FAIR/GOOD
 (SOMEWHAT SCRATCHED)

HUNTSVILLE MGP, AL

MARCH 27, 1968 cont. P.2

STRUCTURE WHICH COULD BE A CYLINDRICAL HORIZONTAL STORAGE TANK ON A SOLID CRADLE; THE POSSIBLE TANK MEASURES 10-15 FEET IN LENGTH.

- ANOTHER PROBABLE CYLINDRICAL HORIZONTAL STORAGE TANK IS LOCATED ALONG THE GULLY AT THE NW EDGE OF THE FACILITY. THIS TANK MEASURES ROUGHLY 15-20 FT. IN LENGTH. THIS HAS AN L-SHAPED PIPE LEAVING IT TO THE SOUTH, THEN SOUTHWEST.
- SCATTERED AT AT LEAST 3 LOCATIONS ARE ^{AT LEAST 11} APRX. 20-FT. LONG BLACK PIPE SECTIONS.
- MORE POSSIBLE PIPE SECTIONS MAY BE STORED IN TWO RACKS JUST N OF THE PURIFYING HOUSE YARD.
- A NARROW, BLACK, ^{RECTANGULAR,} POSSIBLE WASTE PIT IS LOCATED IN THE FORMER COAL YARD, PARALLEL W/ POLLARD ST.

HUNTSVILLE MGP, AL

MARCH 27, 1968 cont. P. 3

- TWO LARGE PILES OF REFUSE/
FILL DIRT ARE VISIBLE AT THE
SW PART OF THE FACILITY AND
IN THE COAL YARD
- TWO SMALL, POSSIBLE VERTICAL
STORAGE TANKS AND SOME OTHER
EQUIPMENT IS VISIBLE AT THE
EAST EDGE OF THE COAL YARD
ALONG THE SIDE OF POLLARD ST.
- ONE PROBABLE PICK-UP TRUCK
AND A SMALLER VEHICLE ARE
VISIBLE AT THE SW END OF
THE PURIFYING HOUSE YARD.
- THE SITE HAS THE APPEARANCE
OF CONSIDERABLE ACTIVITY.

Uniform Image Analysis Report

Environmental Image
Group

Glen O. Gustafson, Ph.D.
P.O. Box 422
42 Banning Drive
Avalon, CA 90704
Tel: (310) 510 - 1541
Cell: (310) 612 - 3505
Blue2002@GMAIL.NET

9/10/11

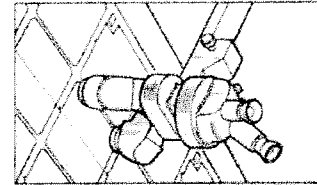
Site Name: HUNTSVILLE MGP, AL

Date of Photography: FEB. 6, 1971

Photo Source: AEROQUEST

Nominal Scale: 1:12,000 Film Type: PAN

Reference No.: _____



Comments: SITE HAS BEEN ENTIRELY
RAZED, GRADED AND BUILT UP INTO A
NEW NEIGHBORHOOD OF (PROBABLY) 2-
STORY DUPLEX HOMES SITUATED ALONG
MODERN, CURVING STREETS. NO REMNANT
FEATURES OF THE FORMER MGP PLANT



NOTE: Objects marked in heavy BLACK over the ghost image, present for this year.

EXCELLENT
IMAGE QUALITY;

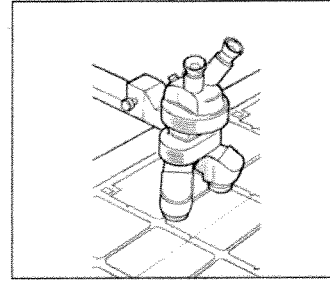
HUNTSVILLE MGP, AL
FEB. 6, 1971 cont.

REMAIN VISIBLE, ALTHOUGH ITS
EXACT FORMER LOCATION IS CLEARLY
VISIBLE FROM FEATURES ACROSS
THE GULLY AND RE TRACKS TO
THE NW.

FAX

*Environmental Image
Group*

Glen C. Gustafson, PhD.
42 Banning Drive, PO Box 422
Avalon, CA 90704
Tel: (310) 612 - 3505
Blue-2002@GMX.NET



LETTER OF TRANSMITTAL

TO: Dennis Unites
GEI Consultants

DATE: September 15, 2011 6:30 PM Pacific Time

SUBJECT: Aerial Image Analysis Reports for 1942, 1950 & 1954

Dennis:

The additional aerial imagery analysis report requested by Scott Laseter, of KGL Attorneys, follows. This covers the National Archives aerial film from March 23, 1942, February 27, 1950, and February 6, 1954.

The "Uniform Image Analysis Report" which follows, has been compiled from stereo aerial films viewed over a light table through a standard Zoom Stereoscope. In its standard form, this equipment permits viewing of aerial films with stereo vision and zoom capabilities up to 30X. The positions of objects on the sketchmaps are only visual approximations, regarding size and location.

In a few cases, the dimensions of ground objects are given. These are not estimations, but rather, approximate calculations based on standard "photo mensuration" techniques. If needed, the science of

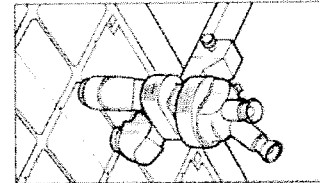
It is my understanding that I have now completed the basic task to the best of my ability in the time provided. In cases like this it is also common to have follow-up, specific questions of the imagery; if this is useful, please let me know. The materials and equipment will remain handy here for a few weeks; I should be able to respond quickly to any discussion items from the imagery.

9/5/11

Environmental Image
Group

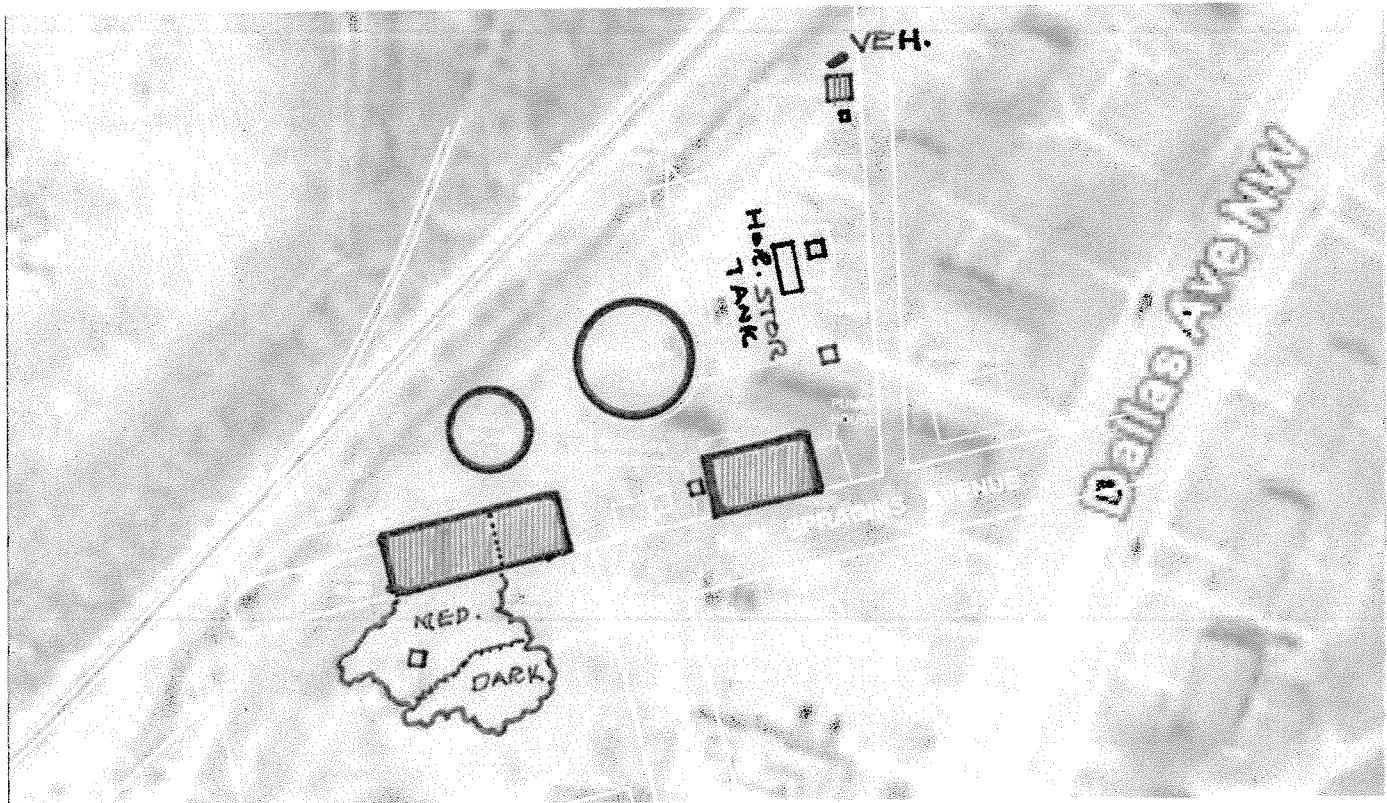
Glen C. Gustafson, PhD
P.O. Box 422
42 Banning Drive
Avalon CA 90704
Tel: (310) 510 - 1541
Cell: (310) 612 - 3505
Blue-2002@GMAIL.NET

Comments: SITE CONTAINS:



- LARGE GASOMETER W/ LIGHT-TONED ROOF.
- SMALLER GASOMETER W/ MOTTLED ROOF.
- PURIFYING HOUSE, BUT NO ADJOINING SHEDS.
- VERY DIRTY/SMUDGY RETORT BUILDING.
- PROBABLE HORIZONTAL STORAGE TANK

IMAGE QUALITY: FAIR/POOR,
BUT STEREO TRIPLET.



NOTE: Objects marked in heavy BLACK over the ghost image, present for this year.

HUNTSVILLE MGP, AL

9/14/11

P. 2

MARCH 23, 1942 cont.

- LOCATED ALONG EAST SIDE OF SITE ABOUT HALF WAY BETWEEN THE PURIFYING HOUSE & RESIDENCE.
- A BROAD, BUT LOW, PROBABLE COAL PILE IMMEDIATELY SOUTH OF THE RETORT BUILDING
 - AN ADJOINING POSSIBLE COAL PILE, SOMEWHAT DARKER AND LOWER, JUST TO THE SOUTH (i.e., DEEPER INTO THE "COAL YARD" AWAY FROM THE RETORT BUILDING).
 - ONE LIGHT-TONED PROB. VEHICLE PARKED AT THE NORTH EDGE OF THE "RESIDENCE".

NOTE: BEST STEEPED VIEW W/ EXPOSURES 68 & 69.

9/14/11

Uniform Image Analysis Report

Site Name: HUNTSVILLE MGP, AL

Date of Photography: FEB. 27, 1950

Photo Source: NATIONAL ARCHIVES

Nominal Scale: _____ Film Type: PAN

Reference No.: _____

Comments: - LARGER GASOMETER IS MOSTLY

GONE, BUT LOWER PART OF THE STEEL SUPER-
STRUCTURE (ESTIMATED 30-FT HIGH) CLEARLY

REMAINS; THE FLOOR OF THE FORMER TANK
APPEARS TO BE SLIGHTLY LIGHT-TONED DIRT.

VERY SLIGHT DISTURBANCES TO FLOOR.

Environmental Image
Group
Glen C. Gustafson, PhD
P.O. Box 422
42 Banning Drive
Avalon, CA 90704
Tel: (310) 510-1541
Cell: (310) 612-3505
Blue-2002@GCMX.NET

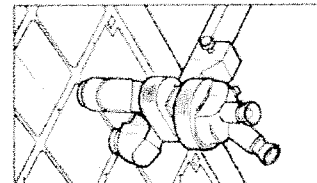
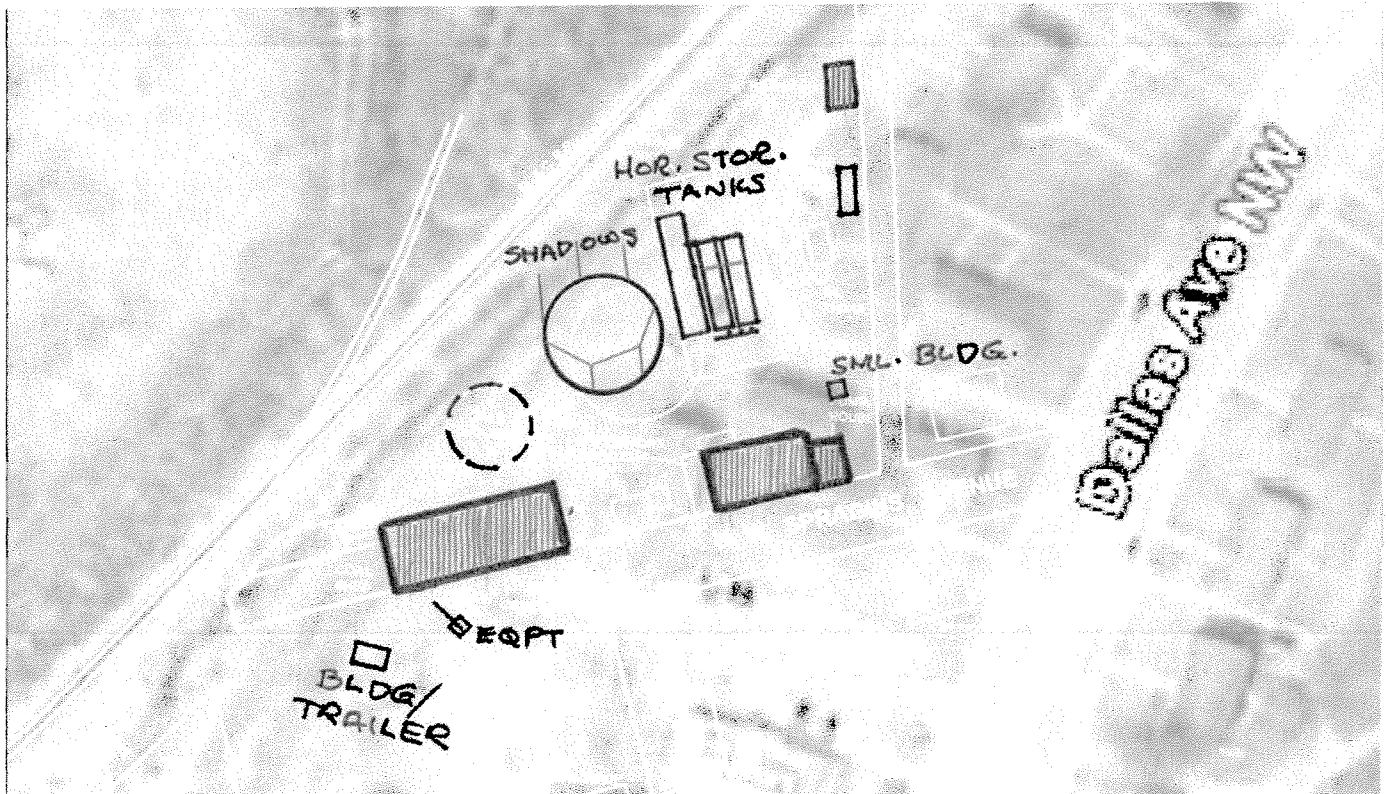


IMAGE QUALITY: GOOD/FAIR
(NO STEREO TRIPLET COVERAGE)



NOTE: Objects marked in heavy BLACK over the ghost image, present for this year.

HUNTSVILLE MGP, AL

FEB. 27, 1950 COMMENTS cont.

- THE FORMER TANK IS ON A SLIGHTLY ELEVATED PIECE OF GROUND, WITH THE REST OF THE PLANT SLIGHTLY LOWER.
- THE SMALLER GASOMETER HAS BEEN MOSTLY REMOVED, BUT THE RING AROUND THE BASE IS STILL CLEARLY VISIBLE, THE FLOOR OF THIS FORMER TANK APPEARS TO BE DIRT, SLIGHTLY DARKER THAN THE SURROUNDING SOIL, ABOUT GRND. LEVEL.
 - THE PURIFYING HOUSE IS PRESENT AND APPEARS TO HAVE A VERY CLEAN-LOOKING ROOF.
 - THE ATTACHED PUMP HOUSE (TO THE EAST) APPEARS AS BEFORE.
 - THREE LIGHT-TONED (SILVER OR WHITE?) HORIZONTAL STOR. TANKS ARE CLEARLY VISIBLE JUST EAST OF THE LARGE GASOMETER. THIS CONSISTS OF ONE VERY LONG ONE AND TWO SLIGHTLY SHORTER ONES LYING PARALLEL AND TO THE EAST.
 - THE RETORT BLDG/GENERATOR ROOM/WATER GAS PLANT BLDG.

HUNTSVILLE MGP, AL

FEB. 27, 1950 COMMENTS cont.

APPEARS COMPLETE & INTACT.

- NO VEHICLES ARE DISCERABLE.
- THE SITE DOES NOT GIVE MUCH EVIDENCE OF BEING ACTIVE.

9/14/11

Uniform Image Analysis Report

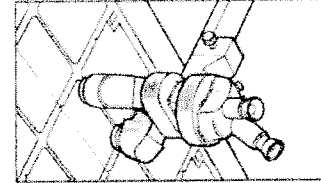
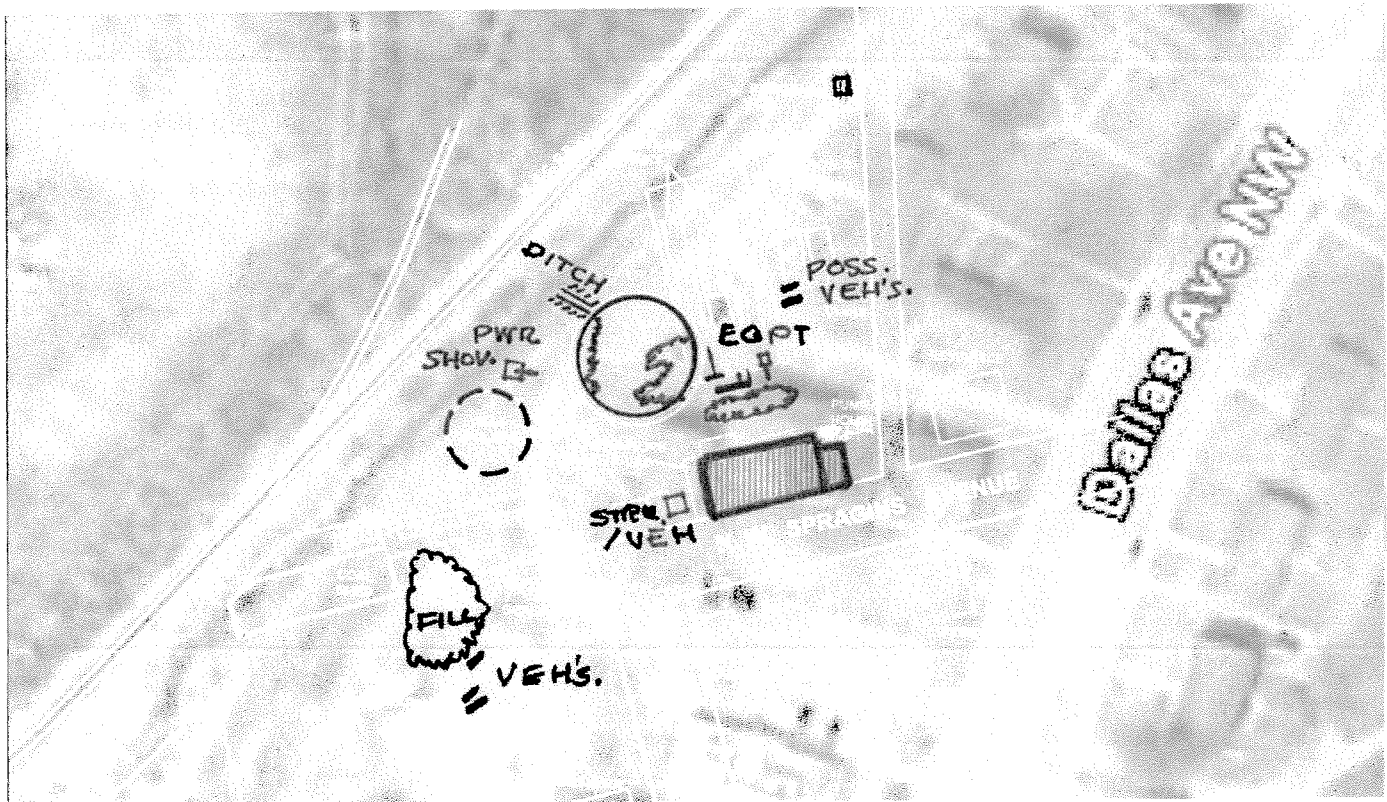
Site Name: HUNTSVILLE MGP, ALDate of Photography: FEB. 6, 1954Photo Source: NATIONAL ARCHIVESNominal Scale: _____ Film Type: PANReference No.: HM-1N-14 & 15Comments: DISMANTLING OF THE PLANT SINCETHE FEB. 1950 AIRPHOTOS HAS PRODUCED
QUITE NOTICEABLE PROGRESS:-THE SMALLER GASOMETER IS COMPLETELY
GONE, BUT A CIRCULAR TRENCH/GROUND
SCAR IS STILL VISIBLE. cont.Environmental Image
GroupGlen C. Gustafson, Ph.D.
P.O. Box 422
42 Banning Drive
Avalon, CA 90704
Tel: (310) 510-1541
Cell: (310) 612-3505
Glen-2002@GCMX.NET

IMAGE QUALITY: FAIR



NOTE: Objects marked in heavy BLACK over the ghost image, present for this year.

HUNTSVILLE MGP, AL
FEB. 6, 1954 COMMENTS cont.

- THE LARGER GASOMETER HAS ALSO BEEN REMOVED, ALTHOUGH THE CIRCULAR FOUNDATION WALL REMAINS, PROJECTING A FEW FEET ABOVE THE TERRAIN. THE DEPRESSED INTERIOR OF THE FORMER GASOMETER APPEARS TO BE MOSTLY WATER-FILLED, ALTHOUGH THERE APPEARS TO BE SOME PROBABLE FILL MATERIAL ALONG THE SOUTHEAST RIM NEAR THE PURIFYING HOUSE. ALSO, A DITCH HAS BEEN CUT FROM THE GASOMETER RIM WESTWARD INTO THE CREEK, PERHAPS TO ALLOW DRAINAGE OF THE PONDED WATER IN THE FORMER TANK DEPRESSION.
- A PROBABLE EXCAVATION STEAM SHOVEL CAN BE SEEN BETWEEN THE TWO FORMER GASOMETERS.
- THE ENTIRE RETORT BUILDING IS GONE AND THE TERRAIN HAS BEEN PARTIALLY GRADED.
- THE NORTH EDGE OF THE FORMER COAL YARD IS RECEIVING DUMP

P.3

HUNTSVILLE MGP, AL
FEB. 6, 1954 COMMENTS cont.

TRUCK LOADS OF LIGHT-TONED
FILL MATERIAL; A TRUCK / CON-
STRUCTION VEHICLE CAN BE SEEN
MOVING AROUND.

- THE THREE LONG HORIZONTAL
TANKS FROM THE FEB. 1950 AERIAL
FILM ARE GONE, ALTHOUGH SOME
REMNANT PARTS OF THE TANKS
MAY BE STORED JUST SOUTH
OF THEIR FORMER LOCATION
(i.e., NEARER TO THE PURIFIER
BUILDING YARD).
- THE PURIFIER BUILDING AND
PUMPHOUSE REMAIN UNCHANGED.
- THE "RESIDENCE" IN THE EXTREME
NORTH CORNER OF THE SITE ALSO
REMAINS UNCHANGED.
- A FEW POSSIBLE VEHICLES CAN
BE DETECTED AROUND THE SITE
BUT NOT WELL, DUE TO IMAGE QUALITY.

HUNTSVILLE MGP, AL
FEB. 6, 1954 COMMENTS cont.

- SOME VERY LIGHT-TONED MOUNDED MATERIAL IS VISIBLE JUST ACROSS THE YARD FROM THE PURIFYING BUILDING (I.E., TO THE NORTH).
- A SMALL STRUCTURE OR VEHICLE IS VISIBLE ON THE PAVEMENT JUST EAST OF THE PURIFYING HOUSE.
- THE BASE OF THE FORMER SUPPORT CRADLE FOR THE 3 LARGE HORIZONTAL STORAGE TANKS IS STILL VISIBLE AT THE NORTH END OF THE FORMER TANKS.
- IT APPEARS THAT CONSIDERABLE GRADING HAS BEEN DONE ON THE HIGHER GROUND SURROUNDING THE TWO FORMER GASOMETERS.